National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

August 10, 2011



General Law Practice Group

Reply to Attn of:

TO:

Distribution

FROM:

Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the "Pearls of

Wisdom: Our Braided Lives" Women In Aerospace Luncheon on August 17.

2011

On August 17, 2011, Women In Aerospace (WIA), will host a luncheon at the Marriott Marquis, in San Francisco, CA, from 11:30 AM to 1:00 PM.

This event is entitled Pearls of Wisdom: Our Braided Lives, and is in support of a White House initiative to meet the challenges faced by U.S. women and girls. The luncheon will be attended by individuals from NASA and other Federal Agencies, representatives of the aerospace industry, professional societies, academia, non-profit organizations, and high school students. Approximately 65 people are expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$65.00 per person. I find that the luncheon meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2).

This event will provide NASA employees with the opportunity to discuss NASA's space program with others who are interested in the role of women in aerospace -related fields. I have determined that free attendance at the above-mentioned luncheon is in the interest of the Agency because it will further agency programs and operations. Accordingly, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event for themselves and their accompanying guests.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor. An "honor basket" will be provided by WIA to allow reimbursement on-site by those employees who may not or choose not to accept free attendance.

Adam F. Greenstone